

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

No. 4:23-CR-5-1M-BM
No. 4:23-CR-5-2M-BM

UNITED STATES OF AMERICA)
)
 v.) INDICTMENT
 NOAH CLARK CAMPBELL)
 SHATINE CAMELER CAMPBELL)

The Grand Jury charges that:

COUNT ONE

Beginning in or about 2021, the exact date being unknown to the Grand Jury, and continuing up to and including on or about December 1, 2021, in the Eastern District of North Carolina and elsewhere, the defendants, NOAH CLARK CAMPBELL and SHATINE CAMELER CAMPBELL did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with each other and other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT TWO

On or about October 6, 2021, in the Eastern District of North Carolina, the defendant, NOAH CLARK CAMPBELL, did knowingly and intentionally distribute

a quantity of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

On or about October 12, 2021, in the Eastern District of North Carolina, the defendant, NOAH CLARK CAMPBELL, did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

On or about October 20, 2021, in the Eastern District of North Carolina, the defendant, NOAH CLARK CAMPBELL, did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

On or about November 15, 2021, in the Eastern District of North Carolina, the defendant, SHATINE CAMELER CAMPBELL, did knowingly and intentionally distribute a quantity of a mixture and substance containing fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

On or about December 1, 2021, in the Eastern District of North Carolina, the defendant, SHATINE CAMELER CAMPBELL, did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled

substance, and did aid and abet another in so doing, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about January 7, 2022, in the Eastern District of North Carolina, the defendant, SHATINE CAMELER CAMPBELL, did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

On or about January 7, 2022, in the Eastern District of North Carolina, the defendant, SHATINE CAMELER CAMPBELL, did knowingly possess a firearm in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, as alleged in Counts One and Seven of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT NINE

On or about January 7, 2022, in the Eastern District of North Carolina, the defendant, SHATINE CAMELER CAMPBELL knowing she had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

ALLEGATION OF PRIOR CONVICTION

For purposes of Title 21, United States Code, Sections 841(b) and 851, NOAH CLARK CAMPBELL, committed the violation alleged in Count Two after a prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

For purposes of Title 21, United States Code, Sections 841(b) and 851, SHATINE CAMELER CAMPBELL, committed the violations alleged in Counts Five, and Seven after a prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or

used in a knowing or willful commission of the offense, or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to, the following:

- a) One Glock 17 9mm handgun bearing serial number BUXR972, seized on January 7, 2022 from 790 Oak Grove Road in Vanceboro, North Carolina, and any and all associated ammunition; and
- b) Assorted ammunition seized on January 7, 2022 from 790 Oak Grove Road in Vanceboro, North Carolina.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty;

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it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:
REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE: 01/24/2023

MICHAEL F. EASLEY, JR.
United States Attorney

Caroline L. Webb for
BY: CAROLINE L. WEBB
Assistant United States Attorney